

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

LEROY ANTHONY MEADOWS

CRIMINAL COMPLAINT

Case Number:

MS-11-60-FLN

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 10, 2011, in Ramsey County, in the State and District of Minnesota, defendant, having previously been convicted on or about November 15, 2005, in Hennepin County District Court of being a prohibited person in possession of a firearm, a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a Sturm Ruger, Model P85MKII, 9mm pistol, with serial number 302-88656,

in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

2/16/11

The Honorable Franklin L. Noel
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

Signature of Complainant

Kylie M. Williamson
ATF

City and State

Minneapolis, MN

Signature of Judicial Officer

SCANNED

FEB 16 2011

U.S. DISTRICT COURT MPLS

STATE OF MINNESOTA)	
)	ss. AFFIDAVIT OF Kylie M. Williamson
COUNTY OF HENNEPIN)	

I, Kylie M. Williamson, being first duly sworn under oath, depose and state as follows:

1. Your Affiant is employed as a Special Agent (S/A) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and has been so employed since August of 2007. Prior to that, your Affiant was employed by ATF for two years as an Industry Operations Investigator. Your Affiant is currently assigned to the St. Paul Group I Field Office, and works with various law enforcement agencies and drug task forces throughout the state of Minnesota. Your Affiant's responsibilities include conducting criminal investigations of individuals and organizations related to the violations of Federal laws, particularly those found in Titles 18, 21, and 26. Your Affiant has participated in numerous investigations which have resulted in the arrests, searches, seizures, and convictions of individuals who have violated Federal law.

2. This affidavit is submitted in support of a Complaint against Leroy Anthony MEADOWS, charging him with possession of a firearm by a convicted felon in violation of Title 18, United States Code, Section 922(g)(1). The facts set forth in the Affidavit are based on your Affiant's training, experience, personal knowledge and observations in this investigation; upon her discussions with other law enforcement officers and agents directly involved in this investigation; and upon her review of official reports submitted in relation to this investigation. Further, this affidavit contains information to support probable cause but is not intended to convey facts of the entire investigation.

3. On January 10, 2011, at approximately 9:15 p.m., Saint Paul Police Department (SPPD) officers were dispatched to 318 Atwater Street, Saint Paul, Ramsey County, Minnesota,

on a 911 call of a reported male victim who had been shot in the arm. Upon arrival, SPPD officers observed the victim, J.P.D., with an apparent gunshot wound to his right arm. J.P.D. advised SPPD officers that he had been watching television in his living room when a vehicle pulled into his driveway and honked. J.P.D. stated that upon hearing this, he went outside, where he observed a silver Mitsubishi Montero in his driveway, driven by a male he knew as "Tony Meadows," later identified as Leroy Anthony MEADOWS. J.P.D. further stated that he observed a female in the front passenger seat who he knew as "Rosie," later identified as Roseanne April KOHNEN. J.P.D. advised that MEADOWS had leaned over KOHNEN and fired three to four shots at him through the open passenger side window, one of which hit J.P.D. in his arm.

4. Upon hearing the call, assisting SPPD officers began looking for the vehicle described by J.P.D., and at approximately 9:22 p.m., located the silver Mitsubishi Montero, bearing MN License Plate (LP) NMA387, westbound on I-94 near Snelling. SPPD Officers followed the suspect vehicle as it exited I-94 and turned southbound on Cretin and continued to follow the vehicle as it then turned west on Marshall Avenue. SPPD officers initiated a traffic stop on the vehicle on the west side of the Lake Street Bridge. As they did so, SPPD officers observed a black object, approximately the size of a handgun, fly out of the passenger side window. Shortly after, the vehicle pulled over and stopped near West River Parkway. The driver was identified as Leroy MEADOWS and the front seat passenger was identified as Roseanne KOHNEN. Both were placed under arrest.

5. Once the suspects were secured at the scene, SPPD officers returned to the area where they had seen the object thrown from vehicle and recovered a black gun holster from the

walkway on the north side of the Lake Street Bridge. The holster had a magazine pocket which contained one black 9mm magazine, holding six live R-P 9mm Luger rounds of ammunition. On the embankment below the bridge, directly below the area where the holster had been recovered, SPPD officers recovered a silver and black Sturm, Ruger & Co., Inc., Model: P85MKII, 9mm pistol, bearing Serial Number: 302-88656. The pistol had one spent R-P 9mm Luger casing in the chamber and 9 live R-P 9mm Luger rounds of ammunition in the inserted magazine.

6. During MEADOWS' arrest, he verbally identified himself as "Tony." During a search of MEADOWS' person incident to arrest, SPPD officers recovered a metal tablespoon containing suspected methamphetamine residue. During a search of KOHNEN'S person, she advised SPPD officers that she had methamphetamine in her pocket and SPPD officers subsequently recovered that suspected methamphetamine. MEADOWS and KOHNEN were both transported to the Ramsey County Law Enforcement Center (LEC) and as KOHNEN was being escorted to a holding cell, she began to cry and stated "he made me take the gun and throw it." KOHNEN further stated that she had never shot a gun in her life and that he had shot it so close to her face.

7. During a post-Miranda interview with KOHNEN at the Ramsey County LEC, KOHNEN advised that she had been picked up by MEADOWS on January 10, 2011 because she had needed a ride, and that she had known MEADOWS for approximately one month. KOHNEN further advised that the two of them went to 318 Atwater, where J.P.D. stays, and that she had known J.P.D. for approximately six months. KOHNEN said that when they arrived at 318 Atwater, MEADOWS honked the horn and she rolled down her window. KOHNEN advised that when J.P.D. came out, MEADOWS leaned over her and fired three to four rounds at J.P.D.

from a handgun and drove away. KOHNEN advised that when MEADOWS saw the police behind them, he told KOHNEN to throw the gun out of the vehicle, to which she did. KOHNEN said that she thought that MEADOWS had shot J.P.D. because of money.

8. On January 11, 2011, SPPD officers executed a search warrant on the suspect vehicle, MN LP NMA387, which had been towed to a secure area at the SPPD impound lot. During the execution of the warrant, SPPD officers recovered one spent R-P 9mm Luger casing from the floor area behind the driver's seat. SPPD officers also examined an apparent bullet defect on the passenger side of the front windshield. SPPD officers used a rod to approximate the trajectory of the projectile and determined that the origination point was consistent with the driver's seat area, at a height approximately at the top of the driver's seat back at the base of the driver's seat headrest.

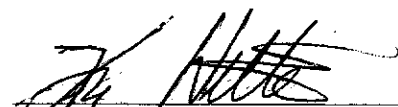
9. ATF Special Agent Andy Hromyak examined the pistol, specifically a Sturm, Ruger & Co., Inc., Model: P85MKII, 9mm pistol, bearing Serial Number: 302-88656, recovered during the above-described incident. Based on his training and experience, he determined that the pistol was manufactured in the state of Arizona and therefore, at some point after manufacture, had been shipped or transported into Minnesota through interstate commerce.

10. Your Affiant has reviewed and is familiar with MEADOWS' criminal history. Specifically, on or about November 15, 2005, MEADOWS was convicted of the felony offense of Possession of a Firearm by an Ineligible Person in Hennepin County, Minnesota. Based on MEADOWS' criminal history, he is prohibited from possessing firearms and/or ammunition.

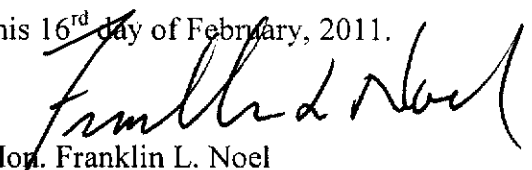
11. Based upon these facts conveyed in this affidavit, your Affiant has probable cause to believe that on January 10, 2011, Leroy Anthony MEADOWS committed the crime of being a

felon in possession of a firearm, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Further your Affiant sayeth not.


KYLIE M. WILLIAMSON
Special Agent

SUBSCRIBED and SWORN to before me
this 16th day of February, 2011.


Hon. Franklin L. Noel
United States Magistrate Judge